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British Columbia Utilities Commission
Sixth Floor, 900 Howe Street, Box 250
Vancouver, BC, V6Z 2N3
Attn: Laurel Ross, Acting Commission Secretary and Director
By Web Posting

Dear Madam:

Re: FortisBC Inc. 2016 Annual Review and 2017 Rates, Order G-123-16,
BC Sustainable Energy Association and Sierra Club BC Final Argument

This is the final argument of the interveners B.C. Sustainable Energy Association and Sierra Club British Columbia, pursuant to the regulatory timetable set out in Order G-123-16.

1. Approvals Requested by FBC

The present proceeding involves:

- the third annual review of FBC's performance under the PBR plan,
- FBC's request for approval under sections 59-61 of the *Act* of:
 - a 2017 rates increase of 2.76% to be applied equally to all components of rates for all customer classes,
 - five new deferral accounts for FBC's costs of its participation in certain Commission proceedings,
 - amortization of the Celgar Interim Period Billing Adjustment deferral account in 2017, and
 - approval of Z-factor treatment for \$1.350 million for incremental O&M and capital expenditures related to the Mandatory Reliability Standards (MRS) Assessment Report No. 8, and
- FBC's request for acceptance under section 44.2 of the *Act* of a capital expenditure schedule for the Ruckles Substation Rebuild project and the Upper Bonnington Old Units Refurbishment project.

2. BCSEA-SCBC

BCSEA-SCBC's interests in this proceeding are as non-profit public interest environmental and energy policy organizations, and as representatives of their members' interests as ratepayers of FBC. BCSEA-SCBC have participated fully in this proceeding. They made information requests to FBC and reviewed FBC's responses. They reviewed FBC's responses to information requests by Commission staff and by other interveners. BCSEA-SCBC reviewed FBC's evidentiary update. They participated in the October 12, 2016 workshop and reviewed FBC's responses to undertakings. BCSEA-SCBC also participated in the 2014 and 2015 annual review and rates

proceedings, the Service Quality Indicators (SQIs) consultation, and the original FBC/FEI PBR proceeding in which the FBC PBR framework was approved by Order G-139-14.

3. Annual Review

The over-arching purpose of the annual review is Item 1 as follows:

“Evaluation of the operation of the PBR Plan in the past year(s) and identification by any party of any deficiencies/concerns with the operation of the PBR plan that have become apparent. Parties are expected to put forward recommendations with how to deal with such concerns.”¹

BCSEA-SCBC have not identified any deficiencies or concerns with the operation of the PBR plan that have become apparent in the past year.

4. Service Quality Indicators

For the “Responsiveness to Customer Needs” SQIs – First Contact Resolution, Billing Index, Meter Reading Accuracy, and Telephone Service Factor (Non-Emergency) – FBC’s 2015 performance meets (or exceeds) the SQI Benchmark.

For the informational indicator “Customer Satisfaction Index,” FBC’s results in June 2016 YTD (8.2), 2015 (8.1) and 2014 (8.1) show a very slight upward trend from the historical low point in 2013 (8.0).

For three of the four “Safety and Reliability” SQIs – Emergency Response Time, SAIDI,² and SAIFI³ – FBC’s 2015 performance meets (or exceeds) the SQI Benchmark.

For All Injury Frequency Rate (AIFR), FBC’s 2015 result is 2.52, which is outside (worse than) the Threshold of 2.39 and the Benchmark of 1.64. The 2015 result (2.52) is only slightly below the 2014 result (2.58). However, the AIFR SQI is a three-year rolling average. On an annual basis, the 2015 results (1.54) are much improved over the annual results for 2014 (3.21) and 2013 (2.82). The 2015 annual results (1.54) have more in common with the annual results for 2009 (1.41), 2010 (1.72), 2011 (1.48), and 2012 (1.72).⁴

BCSEA-SCBC accept that FBC provided evidence of substantial ongoing attention to workplace health and safety. There is no indication at this time that FBC has allowed its performance regarding workplace health and safety to decline due to cost-cutting measures motivated by the PBR framework.

BCSEA-SCBC asked FBC about the informational Telephone Abandon Rate metric. FBC states:

“Abandon rates can be due to waiting times, or due to customers receiving their required information through informational messages in the Company’s Interactive Voice Response (IVR) system such that the customer no longer needs to speak to an agent.”⁵

¹ Exhibit B-2, p.3.

² System Average Interruption Duration Index Normalized.

³ System Average Interruption Frequency Index Normalized.

⁴ Exhibit B-11, p.66.

⁵ Exhibit B-2, p.112, pdf p.121.

BCSEA-SCBC asked FBC if it would be feasible to distinguish between wait time and successful IVR as the cause of telephone call abandon events by reporting separately on calls abandoned within a short period of time typical of a successful IVR result and calls abandoned after a longer period of time, suggesting customer frustration with the length of the wait. BCSEA-SCBC accept FBC's response as follows:

"No. While calls could be categorized based on time intervals, FBC would still not be able to determine with certainty whether the customer disconnected due to the information provided by the IVR, wait times or some other reason.

Moreover, FBC believes that there is no need to distinguish further between the potential factors that influence the Telephone Abandon rate. The abandon rate has remained relatively consistent over the last several years. Further, customer satisfaction is driven by a variety of factors and one cannot say that call abandonment due to wait times and IVR messages are negative or positive indicators of satisfaction. FBC believes that a primary driver of customer satisfaction is whether FBC resolves the issue that led to the customer's call. For example, an IVR message may provide information about an outage but a customer may have low satisfaction simply because an outage has occurred. Or, a customer may abandon a call due to wait times, but may subsequently call back or contact the Company through another means, achieve a resolution, and be highly satisfied as a result."⁶

In the workshop, FBC provided data on Telephone Abandon Rates by # seconds until abandon. About 80% of abandonments were within 120 seconds. BCSEA-SCBC agree that that result indicates that the bulk of the abandonments are not likely due to long wait times. FBC said that as of August 2016 it has implemented a call-back feature.⁷

5. Sharing of Gas and Electric Contact Centre Staff

FBC has two "efficiency and cost savings" initiatives relating to contact centre staff and FBC's corporate affiliate FEI (natural gas). One is the use of FEI contact centre staff in Prince George to answer FBC "electric calls" at times.⁸ The other is the filling of six vacant FEI billing analyst positions by FBC employees in the FBC call centre in Trail who were formerly Customer Service Representatives.⁹ FBC maintains that the appropriate cross-charging is in place. FBC claims \$0.317 million in annual savings resulting from the sharing of gas and electric contact centre staff, and states that this is classified as ongoing and sustainable labour savings.¹⁰ From BCSEA-SCBC's perspective, these initiatives appear to be achieving efficiencies and cost savings.

BCSEA-SCBC are aware that the intervener MoveUp has raised questions about the sharing of FBC and FEI staff in both the FBC and FEI PBR annual reviews. In the FEI 2017 rates and annual review proceeding MoveUp asked the Commission to order a process to determine whether FEI's and FBC's current Per Interaction costing is appropriate and adequately avoids

⁶ Exhibit B-6, BCSEA 3.1.

⁷ Exhibit B-11, p.60.

⁸ Exhibit B-2, pp.4-5.

⁹ Exhibit B-2, p.5; Exhibit B-3, BCUC 2.2.

¹⁰ Exhibit B-3, BCUC 2.1.

cross-subsidization, and a second process to examine more broadly FEI's and FBC's putative melding of customer care functions in terms of cost, service and safety.¹¹ The Commission has not yet issued a decision in that proceeding. Meanwhile, the Commission's proceeding regarding FEI's All-Inclusive Code of Conduct and Transfer Pricing Policy Application¹² may potentially address high-level aspects of FEI's sharing of services with FBC. However, the Panel in that proceeding determined that "Detailed review of operational agreements [between FEI and FBC] including the Shared Services Agreements is part of on-going regulation,"¹³ referring to revenue requirements applications,¹⁴ which presumably includes the 2017 rates component of the current proceeding. At the present time, BCSEA-SCBC are not aware of what argument(s) MoveUp will make in the present proceeding. Accordingly, BCSEA-SCBC have no comment beyond the observation in the preceding paragraph, above.

6. Load Forecast

BCSEA-SCBC accept that FBC's forecasts provide a reasonable estimate of load for 2017. BCSEA-SCBC are satisfied that FBC's load forecast methods are consistent with those used in prior years and accepted by the Load Forecast Technical Committee in 2011.

FBC forecasts an increase in consumption in 2017 when compared to the 2016 Approved forecast. The total normalized gross load – the load required to be served, i.e., before losses – is forecast to be approximately 3,559 GWh, which is a 19 GWh increase over the 2016 Approved gross load.¹⁵ Net of losses, the 2017 load forecast is 3,282 GWh, which is 29 GHW more than the 2016 Seed Year forecast (2016S).¹⁶

FBC says that "The increase in 2017 is due to increased loads in the commercial, wholesale, industrial, lighting and irrigation classes which are partially offset by a decrease in residential load."

FBC's estimates of DSM and other energy savings (in GWh) for 2017 are shown in Table 3-1 of the Application. Forecast 2017 DSM savings are 32 GWh net, and 34 GWh gross. BCSEA-SCBC have argued in the FBC 2017 DSM proceeding that 2017 DSM spending and associated savings should be higher than the levels proposed by FBC. However, it is acknowledged that the forecasts in Table 3-1 are the appropriate figures to be used in determining the 2017 rates.

7. Advanced Metering Infrastructure

BCSEA-SCBC asked FBC to explain at a high level how the recovery of the AMI project's costs and savings fit together. BCSEA-SCBC are satisfied with FBC's response as follows:

"All capital expenditures, O&M costs and O&M savings related to the AMI project are excluded from the capital and O&M formula envelopes under the PBR Plan.

¹¹ MoveUp Written Argument, October 26, 2016, Commission Project No. 3698866, http://www.bcuc.com/Documents/Arguments/2016/DOC_47926_10-26-2016-MoveUp-Written-Argument.pdf

¹² Project No.3698873.

¹³ Decision and Order G-157-16, section 2.

¹⁴ Decision and Order G-157-16, Reasons for Decision, p.3.

¹⁵ Exhibit B-2, p.14.

¹⁶ Exhibit B-2, p.16.

AMI-related O&M costs and savings are forecast annually for inclusion in revenue requirements (see Table 6-3 of the Application, Line 3) and are trued up by way of the Flow-through deferral account (see Table 12-2 of the Application, Line 11).

CPCN-approved capital expenditures are excluded from the PBR formula amount. They include the AMI project costs and the capital costs associated with the installation of radio-off AMI meters, both of which will be completed in 2016. The final 2016 expenditures of \$5.973 million will enter rate base on January 1, 2017.

AMI-related expenditures for sustainment capital, which result from the addition of new software required by the AMI project as described on page 44 of the Application², are forecast annually (see Table 7-3 of the Application, Line 2), enter rate base in the year of expenditure, and are excluded from the PBR formula amount.

Finally, the net costs and fees recovered for manual reading of radio-off AMI meters are recorded in the AMI Radio-Off Shortfall deferral account (Section 11, Schedule 12.2, Line 14), for disposition at a later time.”¹⁷

BCSEA-SCBC have no objection to FBC’s forecast 2017 capital costs, O&M costs and savings related to the AMI project.

While AMI costs and savings are outside the PBR formula, FBC states:

“FBC expects that the AMI costs and savings will be incorporated into O&M Expense in its next cost of service based revenue requirements or an application for rebasing of a PBR plan, which will occur in 2019 for the 2020 test year.”¹⁸

BCSEA-SCBC support that approach.

8. AMI Radio-Off Report

The commission panel in Order G-202-15 regarding FBC’s 2016 rates denied FBC’s request for recovery of AMI Radio-Off shortfall amounts and directed FBC to record the shortfall amounts in a deferral account the disposition of which will be determined in the future. Pursuant to Order G-220-13 FBC is required to file a report on the AMI Radio-Off program by September 30, 2016. To BCSEA-SCBC’s knowledge the AMI Radio-Off Report has not been filed in this proceeding.

When asked about the appropriate forum for review of the AMI Radio-Off Report, FBC noted, correctly, that “the Commission has not determined the need for a public review of the Report.”¹⁹ In BCSEA-SCBC’s view, there should be an opportunity for public review of the September 2016 AMI Radio-Off Report, whether it is within the next annual review or in a separate process.

¹⁷ Exhibit B-6, BCSEA 5.1, footnotes omitted.

¹⁸ Exhibit B-6, BCSEA 5.2.

¹⁹ Exhibit B-6, BCSEA 4.2.

9. 2016 Rates, Revenue Requirement and Earnings Sharing

FBC originally (August 2016) sought approval of a 2017 permanent rate increase of 3.6% above 2016 levels.²⁰ As of its October 5, 2016 Evidentiary Update,²¹ FBC seeks approval of a 2017 rates increase of 2.76%. This corresponds to a forecast revenue shortfall of \$9.739 million in 2017. The main drivers of the forecast revenue shortfall are increased costs of Power Supply, Depreciation and Amortization, and Taxes, offset slightly by the 2017 load forecast being somewhat higher than the projected 2016 load.²² The proposed 2017 rates include distribution of \$0.344 million in earnings sharing to customers.²³

FBC states:

“FBC notes that further changes to the proposed 2017 rates may be necessary, and intends to reflect any further adjustments to 2017 rates in the compliance filing following the Commission’s decision in this Application.”²⁴

BCSEA-SCBC do not have the resources to examine comprehensively FBC’s financial evidence supporting the requested 2017 revenue requirement and rate increase. However, based on their review of the evidence and the discussion during the workshop, BCSEA-SCBC support commission approval of the requested 2017 rate increase subject to any adjustments the Commission Panel may determine to be necessary.

FBC proposes that the 2017 rates increase would be applied to all components of rates for all customer classes. BCSEA-SCBC support that approach.

10. New Deferral Accounts

FBC seeks Commission approval of the establishment of five non-rate base deferral accounts financed at FBC’s short term interest rate for the following regulatory proceedings:

- Self-Generation Policy Stage II Application;
- Net Metering Program Tariff Update Application;
- BCUC Residential Inclining Block Report;
- 2017 Demand Side Management Expenditure Schedule; and
- Transmission Tariff Review.

BCSEA-SCBC support approval of these proposed new deferral accounts.

11. Amortization of Celgar Deferral Account

FBC proposes to fully amortize in 2017 the Celgar Interim Billing Period Adjustment deferral account established by Order G-214-15.²⁵ This deferral account follows the Commission’s

²⁰ Exhibit B-2.

²¹ Exhibit B-2-2.

²² Exhibit B-11, p.9.

²³ Exhibit B-2, pp.1, 56.

²⁴ Exhibit B-2-2, p.3.

²⁵ Exhibit B-2, p.1; Appendix B-1, p.3, pdf p.156.

retroactive approval²⁶ of stand-by rates to be paid by FBC's industrial customer Zellstoff-Celgar and an associated settlement agreement between FBC and Zellstoff-Celgar. The Celgar DA qualifies for exogenous ("Z factor") treatment under the PRB framework.²⁷ The Celgar DA has a maximum amortization period of five years. However, FBC proposes to fully amortize the balance in 2017 "in order to partially offset the amortization of the remaining credit balance (\$12.457 million after tax) of the 2014 Interim Rate Variance account."²⁸ FBC explains:

"Amortizing the full value of the Celgar Interim Period Billing Adjustment account in 2017 will contribute to a more stable rate profile between 2017 and 2018, than would otherwise result due to the amortizing of the large credit balance in the 2014 Interim Rate Variance account in 2017."

BCSEA-SCBC accept that explanation and support the proposal to fully amortized the Celgar DA in 2017.

12. Z-Factor Treatment of Mandatory Reliability Standards Spending

As noted above, FBC seeks approval of Z-factor treatment in 2017 for \$1.350 million for incremental O&M and capital expenditures related to the MRS Assessment Report No. 8.

The Commission Panel in the PBR Decision established the following criteria for evaluating whether the impact of an event qualifies for exogenous factor treatment:

- “1. The costs/savings must be attributable entirely to events outside the control of a prudently operated utility;
- 2. The costs/savings must be directly related to the exogenous event and clearly outside the base upon which the rates were originally derived;
- 3. The impact of the event was unforeseen;
- 4. The costs must be prudently incurred; and
- 5. The costs/savings related to each exogenous event must exceed the Commission-defined materiality threshold.”²⁹

The Commission Panel in the PBR Decision also found that 0.5 percent of 2013 Base O&M is the appropriate materiality threshold,³⁰ which it said was approximately \$300,000 for FBC.³¹

Notably, the Commission approved similar Z-factor treatment for forecast incremental MRS costs in 2016.³²

²⁶ BCUC Order G-149-15.

²⁷ Exhibit B-2, p.91.

²⁸ Exhibit B-2, p.97.

²⁹ Decision and Order G-139-14, p.94.

³⁰ Decision and Order G-139-14, p.95.

³¹ Decision and Order G-139-14, p.96. It is noted that on page 91 of Exhibit B-2 FBC cites "Commission Order G-184-14" in the statement that "The materiality threshold (item 5) for FBC has been established at \$0.301 million, as approved by Commission Order G-184-14." BCSEA-SCBC have been unable to confirm that Order G-184-14 is the correct reference.

³² Decision and Order G-202-15, section 8.

BCSEA-SCBC agree that the forecast incremental MRS spending in 2017 qualifies for Z-factor treatment. This topic was discussed during the October 12, 2016 workshop and BCSEA-SCBC did not discern any reason for not approving the request.

FBC gave a projection of \$530,000 for the continuation of this incremental MRS spending in 2018.³³ The last year of the PBR term is 2019. If the incremental costs associated with MRS Report No. 8 extend beyond 2018 then they would likely be embedded in O&M or capital when rebasing or a cost of service revenue requirement next occurs.³⁴ BCSEA-SCBC have no objection to this proposed treatment.

13. Capital Expenditure Schedule, Ruckles Substation

FBC seeks Commission acceptance under section s.44.2(3) of a capital expenditure schedule for the Ruckles Substation Rebuild project. FBC summarizes:

“The Ruckles Substation Rebuild Project involves rebuilding the existing substation in Grand Forks. The project is required to eliminate the risk of damage and environmental and employee safety concerns due to the substation’s location in the Kettle River flood zone, to address safety and reliability risks presented by obsolete equipment including the risk of arc flash hazard, and to address system reliability concerns and capacity constraints. The Ruckles Substation Rebuild Project will be completed in the winter of 2018 at a cost of \$8.288 million (\$2.143 million in 2017). The project business plan is included as Appendix C.”³⁵

BCSEA-SCBC accept that FBC has shown that the Ruckles Substation Project meets the “project need” criterion. The evidence is that the existing Ruckles Substation has an overall remaining working life of only 3 to 5 years.³⁶ There was a question during the workshop about whether the project would be unnecessary if the City of Grand Forks, as a wholesale customer of FBC, decides to become a transmission customer and builds its own substation. In a follow-up letter dated October 26, 2016, FBC states:

“...FBC confirms speaking with the City in July 2016 about how the preferred option for the Ruckles Rebuild Project considered the City’s plans to voltage convert over the long term and any potential future plans to convert to a transmission customer. The City confirmed that no decisions had been made with respect to whether it would become a transmission customer and did not have concrete plans with regard to the schedule for continuation of its 4kV to 13kV voltage conversion program. At this time, FBC has not received any request from the City to become a transmission customer but, should the City decide to do so, the process to apply to become a transmission customer and then build their own substation would take approximately 3-5 years.”³⁷

Also, during the workshop FBC pointed out that the Ruckles Substation serves FBC customers in addition to the City of Grand Forks as a wholesale customer. BCSEA-SCBC are satisfied that the

³³ T1:24, lines 1-2.

³⁴ T1:24, lines 11-20.

³⁵ Exhibit B-2, p.45; and see Exhibit B-2, Appendix C.

³⁶ Exhibit B-3, BCUC 21.2.

³⁷ Exhibit B-13, p.2.

theoretical possibility of the City of Grand Forks becoming a transmission customer in the future does not obviate the need for the Ruckles Substation Rebuild project.

In the Commission's Decision and Order G-80-16 on FBC's Application for Treatment of Major Project Capital Expenditures it was determined that projects such as the Ruckles Substation Upgrade project that were identified as CPCN projects during the PBR proceeding should be excluded from the formula-driven base capital amount and should be flowed-through as applied for subject to review and approval of the Projects.³⁸ BCSEA-SCBC accept FBC's confirmation that none of the project scope and costs of the Ruckles Substation Rebuild project were included within the 2013 Base Capital.³⁹

The Ruckles Substation Rebuild project was discussed extensively during the October 12, 2016 workshop.⁴⁰ BCSEA-SCBC are satisfied that the proposed rebuild approach is reasonable.

During the workshop it was noted by the intervener BC Municipal Electricity Utilities that the City of Nelson had recently completed the Nelson Hydro Rosemont Substation Rebuild for an as-built cost of \$3.5 million. The implicit question was why the Ruckles Substation Rebuild budget is so much higher, at \$7.6 million. FBC provided a detailed response in Undertaking No. 1.⁴¹ BCSEA-SCBC are satisfied with FBC's explanations for specific aspects of the variance, which account for \$3.6 million of the \$4.1 variance. FBC adds:

“Further, while FBC is not able to quantify the impact, there may also be a discrepancy due to the devaluation of the Canadian dollar since 2012 / 2013 when the Rosemont Substation was constructed.”⁴²

BCSEA-SCBC note that the Ruckles Substation Rebuild project budget is a budget, not an as-built cost. If the Commission accepts the capital expenditure schedule as proposed, FBC is still required to meet prudence obligations in completing the project. BCSEA-SCBC support Commission acceptance of the capital expenditure schedule for Ruckles Substation Rebuild project.

14. Capital Expenditure Schedule, Upper Bonnington Old Units Refurbishment project

FBC seeks Commission acceptance under section s.44.2(3) of a capital expenditure schedule for the Upper Bonnington Old Units Refurbishment project. FBC summarizes:

“The UBO Units Refurbishment Project involves the refurbishment of the more than 100 year old generating Units 1 – 4 (the Old Units), at an estimated cost of \$31.783 million (\$5.898 million in 2017). These units are at end of life and can no longer be operated in a safe, reliable, and environmentally responsible manner. This four-year project will extend the life of the Old Units for an additional twenty years or more, and will reduce the safety and environmental risks

³⁸ Order G-80-14, Reasons for Decision, p.4, cited by FBC at Exhibit B-3, BCUC 25.1.

³⁹ Exhibit B-3, BCUC 25.1.

⁴⁰ T1:25-54.

⁴¹ Exhibit B-13, Undertaking No. 1.

⁴² *Ibid.*

associated with failures of the aged equipment. The project business plan is included as Appendix D.”⁴³

BCSEA-SCBC accept that retaining the status quo is not a viable option. They agree that the four Old Units are “at end of life and can no longer be operated in a safe, reliable, and environmentally responsible manner.”⁴⁴

FBC proposes Option 3, Old Units Refurbishment, over Option 1, Old Units Decommissioning, and Option 2, Old Units Full Life Extension.⁴⁵ Option 3 has the lowest 50-year NPV of incremental revenue requirement of the three options. The figures, rounded, are: Option 1: \$119 million, Option 2: \$47 million, and Option 3: \$34 million.

During the workshop, the intervener Industrial Customers Group questioned whether the Decommissioning option should be pursued. FBC had provided evidence that it would lose entitlement to 114 GWh of annual energy under the Canal Plant Agreement if it decommissioned the Upper Bonnington Old Units.⁴⁶ Presumably, this is why the NPV of Option 1 is very high. ICG asked whether FBC had explored the possibility of reopening the Canal Plant Agreement, presumably to try to sell, if effect, the UBO Old Units entitlements to BC Hydro. FBC confirmed that BC FBC has discussed the UBO Old Units with BC Hydro and that “they know that it’s been our plan all along to upgrade these units.”⁴⁷ FBC filed the Canal Plant Agreement and the Entitlement Adjustment Agreement.⁴⁸

In BCSEA-SCBC’s view, there is no persuasive evidence that attempting to renegotiate the entitlements regarding the Upper Bonnington Old Units is a viable approach that would support entertaining a decommissioning option.

As between the refurbishment (option 3) and full life extension (option 2), BCSEA-SCBC accept FBC’s judgment that the substantially lower NPV cost of refurbishment (\$47 million – \$34 million = \$13 million) supports the refurbishment option.

BCSEA-SCBC are not aware of any basis for rejecting FBC’s estimated capital cost of \$31.78 million for the UBO Old Units Refurbishment project. BCSEA-SCBC support Commission acceptance of the capital expenditure schedule.

15. Conclusion

BCSEA-SCBC have not identified any deficiencies or concerns regarding FBC’s performance under the PBR framework in 2015 and 2016 YTD.

BCSEA-SCBC generally support FBC’s requested remedies under sections 59-61, as discussed above.

BCSEA-SCBC support acceptance of the capital expenditure schedule for the Ruckles Substation Rebuild project and the Upper Bonnington Old Units Refurbishment project under section 44.2.

⁴³ Exhibit B-2, p.45.

⁴⁴ Exhibit B-2, Appendix D, pdf 206.

⁴⁵ Exhibit B-11, p.47.

⁴⁶ Exhibit B-3, BCUC 32.1; 32.1.4; Exhibit B-8, ICG 3.3.

⁴⁷ T1:74, lines 11-19.

⁴⁸ Exhibit B-13, Undertaking No. 2.

All the above is respectfully submitted.

Yours truly,

William J. Andrews



Barrister & Solicitor